

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALLAN CHIOCCA,)	
Plaintiff,)	
)	
VS.)	C.A. NO. 1:19-cv-10482-WGY
)	
TOWN OF ROCKLAND, DEIRDRE)	
HALL, EDWARD KIMBALL, LARRY)	
RYAN, MICHAEL MULLEN, JR.,)	
MICHAEL O'LOUGHLIN, RICHARD)	
PENNY and KARA NYMAN,)	
Defendants)	

**MOTION OF DEFENDANTS, FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF
20 PAGES**

The defendants in this matter hereby move, pursuant to Local Rule 7.1(b)(4), that this Honorable Court grant them leave to file a memorandum in opposition to plaintiffs' Omnibus Motion to Compel. In support thereof, the defendants state that, given the complexity of the Motion, the numerous issues that need be addressed, the Omnibus fashion in which the Motion was filed, and the relief sought, as well as the volume and breadth of plaintiffs' submissions, the defendants respectfully request leave to file a memorandum in opposition to plaintiffs' Motion totaling no more than 30 pages, attached hereto as Exhibit A. This number is less than the eight defendants would separately be entitled to and it is in the interests of judicial economy for the defendants to file a single, omnibus opposition.

WHEREFORE, the respectfully request that this Honorable grant them leave to file a memorandum in excess of 20 pages.

LOCAL RULE 7.1 CERTIFICATION

In accordance with Local Rule 7.1(a)(2), undersigned counsel represents that they attempted to confer with plaintiff's counsel late in the day once they realized that additional pages would be needed but were unable to speak with plaintiff's counsel.

Respectfully submitted,

Defendants,

LARRY RYAN, MICHAEL MULLEN, JR.,
MICHAEL O'LOUGHLIN, RICHARD
PENNEY
AND KARA NYMAN,
By their Attorneys,

PIERCE DAVIS & PERRITANO LLP

/s/ Jason W. Crotty

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Defendant

DIERDRE HALL

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Defendant

EDWARD KIMBALL

By his attorneys,

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/s/ Howard M. Cooper

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that a paper copy shall be served upon those indicated as non-registered participants on July 23, 2021.

/s/ Tara D. Dunn

Tara D. Dunn, Esq.